

EXHIBIT “B”

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August 6, 2014

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Attorneys for Defendants

Via Fax: 713.552.1758

Re: Cause No. 1:08-CV-446; *United States of America, ex rel. Michael N. Swetnam, Jr. v. Valley Baptist Health System and Valley Baptist Medical Center*; In the United States District Court for the Southern District of Texas, Brownsville Division.
WG File #395001

Dear Counsel:

On June 23, 2014, I forwarded a spreadsheet that identified several documents produced by Defendants in the above-referenced matter, which were incomplete. To date, we have not received a response.

Again, I hereby request that the complete documents be produced, together with any and all exhibits attached thereto.

If you are unwilling to do so, I will provide my letters to the Court as our certificate of conference when I file the motion to compel production of these documents next week pursuant to the Scheduling Order in this case.

Should you have any questions or comments, please do not hesitate to call. Thank you for your attention to this matter.

Very truly yours,


Edward W. Allred

EWA:ccp

TRANSACTION REPORT

AUG/06/2014/WED 05:13 PM

BROADCAST

#	DATE	START T.	RECEIVER	COM. TIME	PAGE	TYPE/NOTE	FILE
001	AUG/06	05:12PM	17135521758	0:00:20	2	MEMORY OK ✓	SG3 1942
002		05:13PM	13618845401	0:00:21	2	MEMORY OK ✓	SG3 1942
TOTAL				0:00:41	4		

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DATE: AUGUST 6 2014

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FROM: EDWARD W. ALLRED

RE: SWETNAM
 WG FILE NO 395001

NUMBER OF PAGES (INCLUDING COVER PAGE): 2

COMMENTS:

If there are any problems, please call 210.527.0500 and ask for Colleen Peebles or by email at cpeebles@wattsguerra.com.